

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JIMMY L. ADKINS, KEREM BAY, LANA BONGIOVI, CLEMENT CAMPBELL, ANGELO CARPOLA, ALEXANDER CIOFFI, PATRICK H. CRAIN, DAVID CRONK, NANCY F. DEBE, DENNIS DELUCIE, CHARLES J. ENGEL, MATTHEW FARRELL, BENNY FAILLA, ROBERT J. GIANI, JOHN R. LACKENBAUER, JEAN-PARNELL LOUIS, WILLIAM J. MAHER, MICHAEL G. MCDOWELL, JOHN ROSSI, WILLIAM R. SHANNON, FRED H. SMITH, GARY E. SOBEK, DAMIAN SOBERS, CARMELA SZYMANSKI, ANTHONY TANZA, and CYNTHIA TORRES,

Plaintiffs,

-against-

GARDA CL ATLANTIC, INC.,

Defendant.

Civil Action No. 16-CV-00641 (JMA)(AKT)

**DECLARATION OF LISA M.
GRIFFITH IN SUPPORT OF
DEFENDANT'S MOTION TO DISMISS
THE AMENDED COMPLAINT**

Lisa M. Griffith hereby declares and states:

1. I am a Shareholder in the law firm of Littler Mendelson, P.C., attorneys of record for Defendant Garda CL Atlantic, Inc. in the above-captioned action, and a member of the bar of this Court. I submit this Declaration in support the motion to dismiss the Amended Complaint by Defendant Garda CL Atlantic, Inc. I am fully familiar with the facts set forth below, either by personal knowledge or upon review of my firm's files on this matter.

2. Attached hereto as Exhibit "A" is a true and correct copy of the Amended Complaint filed by Plaintiffs in this action on or about July 28, 2017. It can also be located at ECF Docket Entry No. 33.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 20th day of October 2017 in Melville, New York.

Date: October 20, 2017
Melville, New York

/s/ Lisa M. Griffith

Lisa M. Griffith

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